

LAW OFFICES
RODNEY & BERNSTEIN, P.A.

1925 BRICKELL AVENUE
SUITE D-207
MIAMI, FLORIDA 33129
TEL. (305) 643-9600
FAX: (305) 856-8056

MINDY S. RODNEY*
CAROL A. BERNSTEIN*
* BOARD CERTIFIED EXPERTS IN
IMMIGRATION & NATIONALITY LAW
DANIEL J. KOOSD

E-MAIL ADDRESSES:

MINDY@MINDYLAW.COM
CAROL@MINDYLAW.COM
DANIEL@MINDYLAW.COM

May 23, 2013

**Hon. Magistrate Judge Jacqueline Scott Corley
U.S. District Court for the Northern District of California
San Francisco Division
Courtroom F
450 Golden Gate Ave., 15th Floor
San Francisco, CA 94102**

**Case: True Capital Management, LLC and Tamara Jaric v. United States
Department of Homeland Security and United States Citizenship and
Immigration Services (3:13-cv-00261-JSC)**

**Re: Request for Telephonic Appearance at Case Management Conference
Scheduled for May 30, 2013**

Dear Honorable Magistrate Judge Jacqueline Scott Corley:

Pursuant to Northern District Local Rule 16-10(a) and Your Honor's Civil Standing Order, undersigned counsel for Plaintiffs, Mindy S. Rodney and Daniel J. Koosed, request permission from this Court to appear telephonically at the Case Management Conference for the above-titled case, currently scheduled for May 30, 2013 at 1:30PM. We have conferred with Defendant's counsel to determine if opposing counsel has any objection to this request and Defendant's counsel stated in writing that he has no objection to this request.

We are a small (three attorneys) immigration law firm located in Miami, Florida. Our co-counsel, Mr. Wade Chernick, who personally appeared at the May 16, 2013 motion hearing on Defendants' Motion to Dismiss, is a solo practitioner located near Los Angeles in Encino, California. If Your Honor believes it necessary, we will arrange for a personal appearance at the upcoming Conference but, as a result of the time and expense

required for us to travel to the Court, due to the locations of our respective offices, we request permission to appear telephonically.

As we believe personal attendance at the upcoming Case Management Conference is not needed in order to have an effective conference, and in the interest of mitigating undue expense to our clients, we hereby submit this request to appear telephonically at the May 30, 2013 Case Management Conference.

Thank you for Your Honor's consideration.

Very Truly Yours,

/s/ Mindy S. Rodney

Mindy S. Rodney (*Pro Hac Vice*)

/s/ Daniel J. Koosed

Daniel J. Koosed (*Pro Hac Vice*)

Rodney & Bernstein, P.A.
1925 Brickell Avenue, Suite D-207
Miami, FL 33129
Tel: (305) 643-9600
Fax: (305) 856-8056

Wade J. Chernick, Esq.
Email: wade@chernickimmigration.com
California State Bar No. 123018
16601 Ventura Blvd., Suite 400
Encino, CA 91436
Tel: (818) 907-9505
Fax: (818) 907-5817

Attorneys for Plaintiffs

Counsel shall contact Court Call at
1-888-882-6878 to make the arrangements
to appear by telephone.

Dated: May 24, 2013

